



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 08 2016

**CERTIFIED MAIL 7009 1680 0000 7662 6804**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Ms. Liz Russell  
Division Manager  
Stella-Jones Corporation  
W1038 County Highway U  
Bangor, Wisconsin 54614

Re: Notice of Violation  
Compliance Evaluation Inspection  
WID078675634

Dear Ms. Russell:

On July 28, 2016, a representative of the U.S. Environmental Protection Agency inspected the Stella-Jones Corporation (Stella-Jones) facility located in Bangor, Wisconsin. As a large quantity generator of hazardous waste, Stella-Jones is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Stella-Jones' compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Stella-Jones, EPA's review of records pertaining to Stella-Jones, and the inspector's observations, EPA has determined that Stella-Jones has unlawfully stored hazardous waste without a license or interim status as a result of Stella-Jones' violations of certain requirements for a license exemption under Wis. Admin. Code § NR 662.034(1)-(3). EPA has identified the license exemption requirements violated by Stella-Jones as of the date of the inspection in paragraphs # 1-3, below.

**STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS**

At the time of the inspection, Stella-Jones violated the following large quantity generator license exemption requirements:

1. Drip Pad Design and Operating Requirements

Under Wis. Admin. Code §§ NR 662.034(1)(a)3. and 665.0443(13)(a)4. and (c) [40 C.F.R. §§ 262.34(a)(1)(iii) and 265.443(m)(1)(iv) and (3)], a large quantity generator must ensure that throughout the active life of the drip pad, if the owner or operator detects a condition that may have caused or has caused a release of hazardous waste, the condition shall be repaired within a reasonably prompt period of time following



discovery, in accordance with the following procedures: Upon detection of a condition that may have caused or has caused a release of hazardous waste (e.g., upon detection of leakage by the leak detection system), the owner or operator shall do all of the following: Immediately after discovery of the condition, notify the department of the condition and, within 10 working days, provide a written notice to the department with a description of the steps that will be taken to repair the drip pad and clean up any leakage, and the schedule for accomplishing this work. Upon completing all repairs and clean up, the owner or operator shall notify the department in writing and provide a certification, signed by an independent qualified, registered professional engineer, that the repairs and cleanup have been completed according to the written plan submitted in accordance with par. (a) 4.

During the inspection of records, EPA reviewed the documentation for the annual drip pad inspection by a professional engineer. On 9/30/15, the 2015 annual drip pad inspection was conducted by Ericksen Roed & Associates (Commission Number: 2015-809). Terry D. Nuesse, P.E., was the site observer and had WI License No. 38260. A letter dated 10/9/15, from Ericksen Roed & Associates (ERA) indicated its findings for the structural inspection of existing steel pad and compliance with design and operating requirements and drip pan integrity to Stella-Jones. The 10/9/15 letter indicated that the 9/30/15 inspection documented that the 8-inch tear was repaired, but that the 4-inch crack was not repaired (findings from the 2014 annual drip pad inspection). Ms. Werlein stated that the 4-inch crack was fixed, but Stella-Jones did not follow-up and notify WDNR or ERA. On 11/5/14, the 2014 annual drip pad inspection was conducted by the same professional engineer from ERA as in 2015. A letter dated 11/19/14, from ERA indicated that there was a slight tear approximately 8 inches in length at the track on the north end of the tram storage area on the steel curb. The same 11/19/14 letter also indicated the recommendation of a repair (with a ¼ inch bevel weld) for a crack approximately 4 inches long on an existing weld near the west end of the tram storage area.

Since the inspection, Stella-Jones submitted correspondence dated August 5, 2016, documenting an enclosed letter dated August 3, 2016, letter to ERA that the crack identified in the 2015 drip pad certification inspection was repaired immediately following its discovery during that inspection. The August 3, 2016, letter included photographs to document the completed repair. However, the August 5, 2016 correspondence made no mention that these two discovered conditions and completed follow-up repairs were reported to the WDNR in writing.

## 2. Marking Accumulation Start Dates on Containers

Under Wis. Admin. Code § NR 662.034(1)(b) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must ensure that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

During the inspection of the Hazardous Waste Building and 90-Day Area, there was one 30-gallon container that was labeled as “Hazardous Waste” and “D023, D024, D025, D026”, that was closed, but was not marked with an accumulation start date. Then, Ms. Werlein marked a date of 6/23/16 on the container. A picture was taken to document this action. Thus, no further actions are necessary for paragraph # 2.

## 3. Testing and Maintenance of Equipment

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0033 [40 C.F.R. §§ 262.34(a)(4) and 265.33], a large quantity generator must ensure that all facility communications or alarm systems, fire protection equipment, spill control equipment and decontamination equipment, where required, shall be tested and maintained as necessary to assure its proper operation in time of emergency.

During the inspection of records, Ms. Werlein stated that emergency equipment inspections were occurring for the fire protection and decontamination equipment, but not for the spill kits.

**Summary:** By violating the requirements for a license exemption, above, Stella-Jones became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. Stella-Jones failed to apply for such a license. Stella-Jones’ failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 670.001(3), 670.010(1) and (4) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

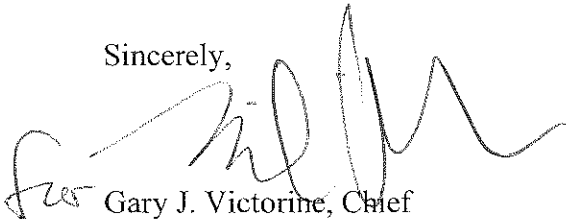
At this time, EPA is not requiring Stella-Jones to apply for a Wisconsin hazardous waste operating license (for the areas identified above) so long as it immediately establishes compliance with the requirements for a license exemption outlined in paragraphs # 1 and # 3, above.

During the inspection, as observed by EPA, and after the inspection, as documented in an August 5, 2016, email to EPA, you took certain actions to establish compliance with the above requirement in paragraph # 2. Your letter did not include any actions you may have taken related to the drip pad operating requirements (notification of WDNR) in paragraph # 1, and the testing and maintenance requirements (spill kits) in paragraph # 3. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation,

requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs # 1 and # 3. You should submit your response to Bryan Gangwisch, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Gangwisch, of my staff, at (312) 886-0989 or at [gangwisch.bryan@epa.gov](mailto:gangwisch.bryan@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Amy Werlein, Stella-Jones, [AWerlein@stella-jones.com](mailto:AWerlein@stella-jones.com)  
Scott Szymanski, WI DNR, [scott.szymanski@wisconsin.gov](mailto:scott.szymanski@wisconsin.gov)  
Michael Ellenbecker, WI DNR, [michael.ellenbecker@wisconsin.gov](mailto:michael.ellenbecker@wisconsin.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5, LCD, RCRA BRANCH, LR-8J  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Stella-Jones Corporation


EPA ID No.: WID078675634

ADDRESS: W1038 County Highway U  
Bangor, WI 54614

DATE OF INSPECTION: July 28, 2016

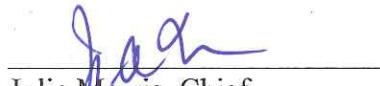
EPA INSPECTOR: Bryan Gangwisch

PREPARED BY:

  
Bryan Gangwisch  
Environmental Scientist  
Compliance Section #2

8/31/16  
Date Completed

APPROVED BY:

  
Julie Morris, Chief  
Compliance Section #2

9/7/16  
Date

### **Purpose of Inspection**

This inspection was an evaluation of Stella-Jones Corporation (Stella-Jones), and its compliance with hazardous waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

### **Participants**

Amy Werlein, EH&S Supervisor	Stella-Jones
Liz Russell, Division Manager	Stella-Jones
Brad Martin, Treating Supervisor	Stella-Jones
Bryan Gangwisch, Environmental Scientist	U.S. EPA

### **Introduction**

I arrived at the site at approximately 9:30 a.m. The weather consisted of overcast conditions with light rain and light wind, and an ambient air temperature of approximately 70 degrees Fahrenheit. I introduced myself, presented my inspector credentials, and described the purpose of the inspection and the process by which I intended to conduct the inspection. Ms. Werlein and Ms. Russell provided me with a verbal description of the site, led the tour throughout the facility, and then attempted to provide me with the records I requested for review.

### **Site Description**

Stella-Jones was operating as a large quantity generator at the time of the inspection based upon hazardous waste generation rates.

The following facility description and waste generation information was stated by Ms. Werlein and Ms. Russell unless otherwise noted. The facility was constructed and has been in operation since approximately 1978, and started as Webster Wood Preserving. The facility has been owned and operated by Stella-Jones since 2005. The same operations have performed at this facility since original construction. Stella-Jones performs railroad tie treating with creosote or a treatment mix of 50% creosote and 50% # 6 fuel oil. Approximately 95% of product creosote comes into the facility via railcar (small percentage of product creosote comes in via truck), and the product # 6 fuel oil comes in via truck. Typically 8 ½-foot cross ties are treated at the facility, but switch ties ranging from 10 to 25-foot long can also be treated. After tie treatment, Stella-Jones performs a pre-plating (pre-set plates and placed spikes in the ties). Stella-Jones has never performed treated lumber or treated pole operations. There are approximately 70 total employees that work 24/7 (at the treating plant with 2-5 days of shutdown per year) and two 8-hour shifts Monday through Friday typically (yard side).

Stella-Jones operates three pressure cylinders that have a door on one end. A string of eleven trams (common charge) holding approximately 759 ties (per charge) fill each cylinder. Stella-



Jones treats the ties utilizing a Rueping process, which is treating air dried wood (empty cell method – low amount of drippage), while utilizing heating and vacuum. There are three work tanks 1-3 (each 50,000-gallon process tanks) for each of the three cylinders. There are also two product storage tanks 4 (50,000 gallons capacity) and 5 (40,609 gallons capacity). The cylinders are then filled with treating solution (100% creosote in the past, but currently the solution is a mix of 50% creosote and 50% # 6 fuel oil) that circulates between the work tank and cylinder. Heat exchangers are utilized in the work tank and cylinder. A pre-desired and calculated temperature and air pressure ratio is reached while evacuating out and re-introducing the treating solution out and into the cylinder. An endpoint (pre-desired retention of creosote retained in wood) and expansion bath (reduces quantity of drippage) are utilized. Then a vacuum is pulled on a charge inside of the cylinder (treating solution is pulled from the cylinder back to the work tank). The door on the cylinder is opened via a crack and vacuum process, the charge is pulled out of the cylinder and is placed on one of two drip pads. Drip Pad 1 is associated with Cylinder 1. The combined Drip Pad 2/3 is associated with Cylinders 2 and 3. The drip pads are constructed of steel and don't have to be epoxy coated. There are no liners or leak detection collection system associated with the drip pads.

There is an on-site waste water treatment process at Stella-Jones that consists of pre-treatment, floating, settling, removal, and evaporation. The waste water is generated from Boultonizing waste waters, Rueping vacuum water, the wash waters from cleaning the drip pads, wash water from the Pump Room floor sump, Front Door sump, and the Railroad Car Unloading sump. A pre-conditioning step (Boultonizing) is utilized for ties that have an above 50% moisture content. The collection of treating solution and water from the Boultonizing process collect in one of two 100-gallon boulton tanks. The Boultonizing waste water is then pumped to Tank 7, the waste water collection tank (39,152 gallon capacity). Phase separation occurs in Tank 7. Waste water is taken out of the middle of Tank 7 and pumped to Tank 9 (25,381 gallon capacity), which is the stock tank prior to pre-treatment. One 100-gallon mix tank is utilized for pH adjustment, and then a polymer/coagulate flocking agent is added. There is also one 6,000-gallon (four compartment) double baffle oil/water separator to pull back the floating and sinking oils. The water then comes out of the separator and goes into one 2,000-gallon tank and is transferred via pump to one of two evaporators. The waste water evaporators at the facility are regulated via a synthetic minor air permit through WDNR. Stella-Jones is currently addressing the potential removal of the build-up of concentrated wood sugars and tannins (pending waste characterization) from the evaporators.

Stella-Jones prior to the summer of 2011 approximately, was treating the waste water and then discharging the treated waste water via a WPDES permit. Stella-Jones let their WPDES permit expire due to different parameters and limits set by WDNR that could not be met by the facility. For at least six to eight months (until evaporator system began operating), Stella-Jones shipped their generated waste water off-site as hazardous waste. The hazardous waste water was stored in Tank 7 (and possibly Tank 9) prior to shipment off-site (rail shipments) during that period. Stella-Jones (along with involvement from WDNR) conducted pre-treatment trials to determine publicly-owned treatment works (POTW) acceptance. Stella-Jones determined that it was regulatory and technically feasible to hook into the nearest POTW lines. However, Stella-Jones

made the determination that their facility was not close enough to hook into the nearest POTW lines.

There was one designated hazardous waste container storage area located at the facility. There were approximately two satellite accumulation areas (SAA) located throughout the facility. Stella-Jones was not managing any tanks at the facility as hazardous waste tanks at the time of the inspection. There was one pond on the facility property that is utilized as a storm water pond. The facility in the past had a separate WPDES permit to discharge cooling tower water and boiler blowdown to this pond.

In December 2015/January 2016, an evaporator tank's stack plugged, pressure built up, and caused material to blow outside of containment. Also, in September 2012, an obstructed air lock caused material to blow outside of containment.

The main waste streams generated at Stella-Jones consist of: routine wood treating process waste (treating plant in-line strainer cleaning, contaminated personal protective equipment (ppe), absorbent, socks, and drip pad cleaning residue, treated storage yard contaminated drippage cleanup waste, waste water, and sump, cylinder and tank cleaning waste), sand blasting waste, and aerosol residue. Approximately every 10 years, or based upon inspection findings, the three process work tanks and two product storage tanks (tanks 1-5) are cleaned out. The hazardous waste codes associated with the main waste types that are generated at Stella-Jones consist of: D001, D023, D024, D025, D026, D039, F003, and F034. The facility's generated spent universal waste lamps and batteries is being picked up by Lamp Recyclers, Inc., (Green Bay, Wisconsin) for recycling. Used oil is generated and is being picked up by Rock Oil (Stratford, Wisconsin) for recycling (used oil contaminated absorbent also is picked up by Rock Oil). Scrap metal is generated and is being picked up to be recycled by Alter Metal Recycling (La Crosse, Wisconsin). The facility's generated clean wood/pallets is picked up for recycling by Dubuque Hardwoods, Inc., (Dubuque, Iowa).

### **Site Tour**

A physical walk-through of the facility was conducted at approximately 11:30 a.m. We started at the Vehicle and Maintenance Garage. There were two 55-gallon drums that contained used oil absorbent as stated by Ms. Werlein. Both drums were labeled as "Oil Contaminated Absorbent Material." There was one 275-gallon tote that was labeled as "Used Oil", and was situated inside of a bermed area. There was one 55-gallon drum that was labeled as "Used Oil Filters Only." There were several containers that contained product coolants and product hydraulic oils as stated by Ms. Werlein. Stella-Jones operates and services eleven forklifts and five knuckle booms as stated by Ms. Werlein and Ms. Russell.

Next, I inspected the Cold-Side Storage of the Vehicle and Maintenance Garage. There was one SAA that consisted of one 30-gallon container. The container was labeled as "Hazardous Waste" and "F003, F002, D001, D039", and was closed. There was one box that was labeled as "Universal Waste Lamps", was dated 3/14/16, and was closed. There was one box that was labeled as "Universal Waste Ballast", was dated 3/23/16, and was closed. There was one box that

was labeled as "Universal Waste Batteries", was dated 3/14/16, and was closed. There was one cylindrical container (four-foot spent bulbs as stated by Ms. Werlein) that was labeled as "Universal Waste Lamps", was dated 3/18/16, and was closed. There was one cylindrical container (eight-foot spent bulbs as stated by Ms. Werlein) that was labeled as "Universal Waste Lamps", was dated 3/18/16, and was closed. A picture was taken.

At the Storage Yard South of the Pond, there were several treated ties in storage. There were no visible stains around the pallets of ties. A picture was taken. This area is inspected daily as stated by Ms. Werlein.

On the way to inspect the Pump Room, I observed the documented daily inspection log (for month of July) for the storage yards. There are seven storage yards as stated by Ms. Werlein and Ms. Russell. I also observed the documented weekly inspection log for the drip pads and sump cleaning.

Next, I inspected the Pump Room. I observed Cylinders 1-3. I also observed the Boulton waste water tanks.

I observed the Treating Control Room's Office.

At the Tank Farm, I observed the three work tanks and two product storage tanks.

Next, I observed the Pump Room Sump area. There was a parts washer that utilizes a non-solvent cleaner as stated by Ms. Werlein.

At the Rail Road Car and Tanker Truck Unloading Area Sump, there was one SAA that consisted of one 55-gallon drum. The drum was labeled as "Hazardous Waste" and "F034", and was closed. A picture was taken.

Next, I observed the Front Door Sump area. The oil residue from the process is put into the combined waste water/oil separator after being first introduced into Tank 7 as stated by Ms. Werlein.

Then, I inspected Drip Pad 1 and Drip Pad 2 and 3. Pictures were taken of the Drip Pads and berm.

At the Hazardous Waste Building and 90-Day Area, I observed the weekly inspection log (for month of July). Ms. Werlein stated that she conducts the weekly inspections for this area. Ms. Werlein stated that a recent shipment occurred on July 25, 2016. There were three 55-gallon drums that were labeled as "Sand Blasting", and were closed. Ms. Werlein stated that the three drums that contained the sand blasting waste stream were non-hazardous waste drums. There was one 30-gallon container that was labeled as "Hazardous Waste" and "D023, D024, D025, D026", was closed, but was not marked with an accumulation start date. A picture was taken. Then, Ms. Werlein marked a date of 6/23/16 on the container. A picture was taken. There were

seven 55-gallon drums that were all labeled as "Hazardous Waste", "F034", and "Routine Process Waste", all seven drums were closed, and all seven drums were marked with accumulation start dates that were within ninety days from the date of the inspection (oldest observed date was 6/23/16). Aisle space was sufficient. A picture was taken. There was a fire extinguisher, spill containment equipment, eye wash and emergency shower station, and two-way radio usage of any employee in the area. The Hazardous Waste Building and 90-Day Area was also bermed and sloped providing containment.

The facility's fire extinguishers are inspected monthly and annually by Mississippi Welders as stated by Ms. Werlein.

Next, I inspected the Boiler Building. I observed Tank 7, in which rudimentary waste water treatment/settling occurs as stated by Ms. Werlein. Tank 7 is primarily utilized for storage as stated by Ms. Werlein. Pictures were taken. The waste water in the middle of Tank 7 is drawn out and pumped to Tank 9, and then is pumped to the Waste Water Treatment Building as stated by Ms. Werlein. I observed the lines and pumps associated with Tanks 7 and 9. Pictures were taken.

I observed the Waste Water Treatment Building. Pictures were taken. I observed the 100-gallon mix tank, the oil/water separator, and the 2,000-gallon tank that holds the treated waste water prior to being pumped to one of the two evaporators. Ms. Werlein stated that heavy or light oils are recovered from the product recovery tank.

I observed the north and south evaporators. Pictures were taken. Ms. Werlein stated that the cleaned waste water is pumped back to the evaporators.

### **Record Review**

The review of manifests was conducted. Manifests are kept on-site for at least 3 years. The most recent manifests show that all hazardous waste is sent to the following TSDFs: Michigan Disposal Waste Treatment Plant (MID000724831), EWS Alabama (ALD981020894), Rineco (ARD981057870), WRR Environmental Services (WID990829475), and Heritage-WTI, Inc., (OHD980613541). The following transporters were also used: Rineco Transportation, LLC (ARR000016733), Coal City Cob Company, Inc., (TXR000079839), Freehold Cartage, Inc., (NJD054126164), and Chief Liquid Transport (WID088878871). All LDR notices were available for review on each manifest for each waste stream. Ms. Werlein or Brad Martin typically signs the manifests.

Emergency equipment inspections were occurring for the fire protection and decontamination equipment, but not for the spill kits as stated by Ms. Werlein.

The daily inspections were documented and reviewed (three years of inspections) for the Treated Storage Yard.

The weekly drip pad inspections were documented and reviewed. On 11/5/14, a comment on the inspection log indicated that a repair of two small welds on the outer lip of pad were made. In 2016, a comment on one of the logs indicated a small repair was made to the outer lip of the pad. Ms. Werlein stated that those documented repairs were not conditions that may cause a release of hazardous waste, therefore WDNR was not notified of them.

The documentation for the annual drip pad inspection by a professional engineer was reviewed. On 9/30/15, the 2015 annual drip pad inspection was conducted by Ericksen Roed & Associates (Commission Number: 2015-809). Terry D. Nuesse, P.E., was the site observer and had WI License No. 38260. A letter dated 10/9/15, from Ericksen Roed & Associates (ERA) indicated its findings for the structural inspection of existing steel pad and compliance with design and operating requirements and drip pan integrity to Stella-Jones. The 10/9/15 letter indicated that the 9/30/15 inspection documented that the 8 inch tear was repaired, but that the 4 inch crack was not repaired (findings from the 2014 annual drip pad inspection). Ms. Werlein stated that the 4 inch crack was fixed, but Stella-Jones did not follow-up and notify WDNR or ERA. On 11/5/14, the 2014 annual drip pad inspection was conducted by the same professional engineer from ERA as in 2015. A letter dated 11/19/14, from ERA indicated that there was a slight tear approximately 8 inches in length at the track on the north end of the tram storage area on the steel curb. The same 11/19/14 letter also indicated the recommendation of a repair (with a ¼ inch bevel weld) for a crack approximately 4 inches long on an existing weld near the west end of the tram storage area. On 10/25/13, the 2013 annual drip pad inspection was conducted by ERA. ERA submitted its report via a letter dated 11/27/13.

The documented weekly hazardous waste inspection logs for the Hazardous Waste Building and 90-Day Area were reviewed (three years of inspections).

Waste determinations were documented through analytical testing, waste profiles or determined by generator knowledge (MSDS). I reviewed the analytical report for the TCLP procedure (4/21/16) conducted by Davy Laboratories (La Crosse, Wisconsin) (WDNR certified # 632021390) for the sand blast waste stream.

I observed the spill reporting documentation for the Tank 6 (former evaporator) blowout. The incident (reportable spill or release) was reported on 1/3/16 to the National Response Center (NRC) and WDNR. The cleanup involved 46 drums and several roll-offs of contaminated soil.

There was a contingency plan in place for the facility. The plan was titled "Integrated Contingency Plan." The plan was last revised in June 2016. The listed primary emergency coordinator was Ms. Russell and the alternate emergency coordinators were listed in the plan for the facility. Copies of the contingency plan have been sent to all required local emergency authorities as stated by the plan and Ms. Werlein.

There was a RCRA hazardous waste management training program in place at the facility. There were facility annual RCRA training sign-in sheets provided that documented that the annual RCRA trainings were conducted and received. The RCRA hazardous waste training is conducted by Ms. Werlein.

There were no tank assessments nor documented daily inspections provided for any applicable hazardous waste tank or any drip pad collection sump during 2011.

The waste minimization program for the facility was documented (dated 9/24/12) and observed.

The last three submitted annual hazardous waste reports were retained on-site.

### **Closing Conference**

I summarized the RCRA requirements for the following: notification to WDNR for any drip pad conditions that may cause a release of hazardous waste (two instances), documentation and management of Tank 7 (potentially Tank 9 also) as a hazardous waste tank, documentation and management of Tank 7 (potentially Tank 9 also) and the applicability of its associated system equipment under Subparts BB and CC, emergency equipment inspections of the facility's spill kits, and marking the accumulation start dates on hazardous waste containers in storage identified during the inspection. The inspection concluded at approximately 4:43 p.m.

Stella-Jones made no claim of confidential business information related to any pictures taken or documents received by U.S. EPA during the inspection.

Documents received during this inspection are as follows:

- copy of MSDS for creosote oil (dated 3/31/08 and 10/5/09)
- copy of MSDS for creosote/coal tar solution and creosote oil (dated 10/8/10)
- copy of facility's generated wastes and associated management of the wastes
- copy of ERA's letter to Stella-Jones summarizing the 2015 Structural Inspection of Existing Steel Drip Pan Integrity
- copy of facility's RCRA hazardous waste training slides

Documents given to Stella-Jones during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- SHWEC Pollution Prevention handout

A photo log is attached consisting of twenty-one (21) photos taken by U.S. EPA during the inspection.



1. A view, at the Cold-Side Storage of the Vehicle and Maintenance Garage, of the facility's management of its generated universal waste.

Stella-Jones Corporation, Bangor, WI  
Bryan Gangwisch, U.S. EPA 7/28/16





2. A view, at the Storage Yard South of the Pond, of several treated ties in storage.  
There were no visible stains around the pallets of ties.

Stella-Jones Corporation, Bangor, WI  
Bryan Gangwisch, U.S. EPA 7/28/16





3. A view, at the Rail Road Car and Tanker Truck Unloading Area Sump, of one satellite accumulation area (SAA) that consisted of one 55-gallon drum. The drum was labeled as "Hazardous Waste" and "F034", and was closed.

Stella-Jones Corporation, Bangor, WI  
Bryan Gangwisch, U.S. EPA 7/28/16



4. A view of Drip Pad 1.

Stella-Jones Corporation, Bangor, WI  
Bryan Gangwisch, U.S. EPA 7/28/16



5. A view of Drip Pad 2 and 3.

Stella-Jones Corporation, Bangor, WI  
Bryan Gangwisch, U.S. EPA 7/28/16





6. A view of the berm on the side of Drip Pad 2 and 3.

Stella-Jones Corporation, Bangor, WI  
Bryan Gangwisch, U.S. EPA 7/28/16



7. Another view of Drip Pad 2 and 3.

Stella-Jones Corporation, Bangor, WI  
Bryan Gangwisch, U.S. EPA 7/28/16



**HAZARDOUS WASTE**

**FEDERAL LAW PROHIBITS IMPROPER DISPOSAL**  
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
NA3082. Hazardous waste, liquid, n.o.s. (Cresols), 9, III

PROPER D.O.T. SHIPPING NAME \_\_\_\_\_

**GENERATOR INFORMATION:**

NAME Stella Jones Corp

ADDRESS W1038 Country Rd U, Suite 101

CITY Bangor

E.P.A. I.D. NO. WI0078675634 STATE WI ZIP 54614

E.P.A. STATE NO. D023 D024 D025 D026 Manifest Tracking Number: \_\_\_\_\_

ACCUMULATION START DATE \_\_\_\_\_

PROFILE 2012030141 DOCUMENT \_\_\_\_\_

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS WASTE

8. A view, at the Hazardous Waste Building and 90-Day Area, of one 30-gallon container that was labeled as "Hazardous Waste" and "D023, D024, D025, D026", was closed, but was not marked with an accumulation start date.

Stella-Jones Corporation, Bangor, WI  
Bryan Gangwisch, U.S. EPA 7/28/16

**HAZARDOUS WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL  
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
NA3082 Hazardous waste liquid, n.o.s. (Crisolite) 9 III

PROPER E.P.A. SHIPPING NAME \_\_\_\_\_

**GENERATOR INFORMATION:**

NAME Stella Jones Corp

ADDRESS W1038 Country Rd U, Suite 101

CITY Bangor

STATE WI ZIP 54814

E.P.A. I.D. NO. WID076675634

Manifest Tracking Number: D023 D024 D025 D026

ACUMULATION START DATE 6/23/16

OFFICE 2012030141 INCIDENT

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

9. Another view, at the Hazardous Waste Building and 90-Day Area, of the same drum's label (in photo # 8), after Ms. Werlein marked a date of 6/23/16 on the container.

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10. A view, at the Hazardous Waste Building and 90-Day Area, of the aisle space.

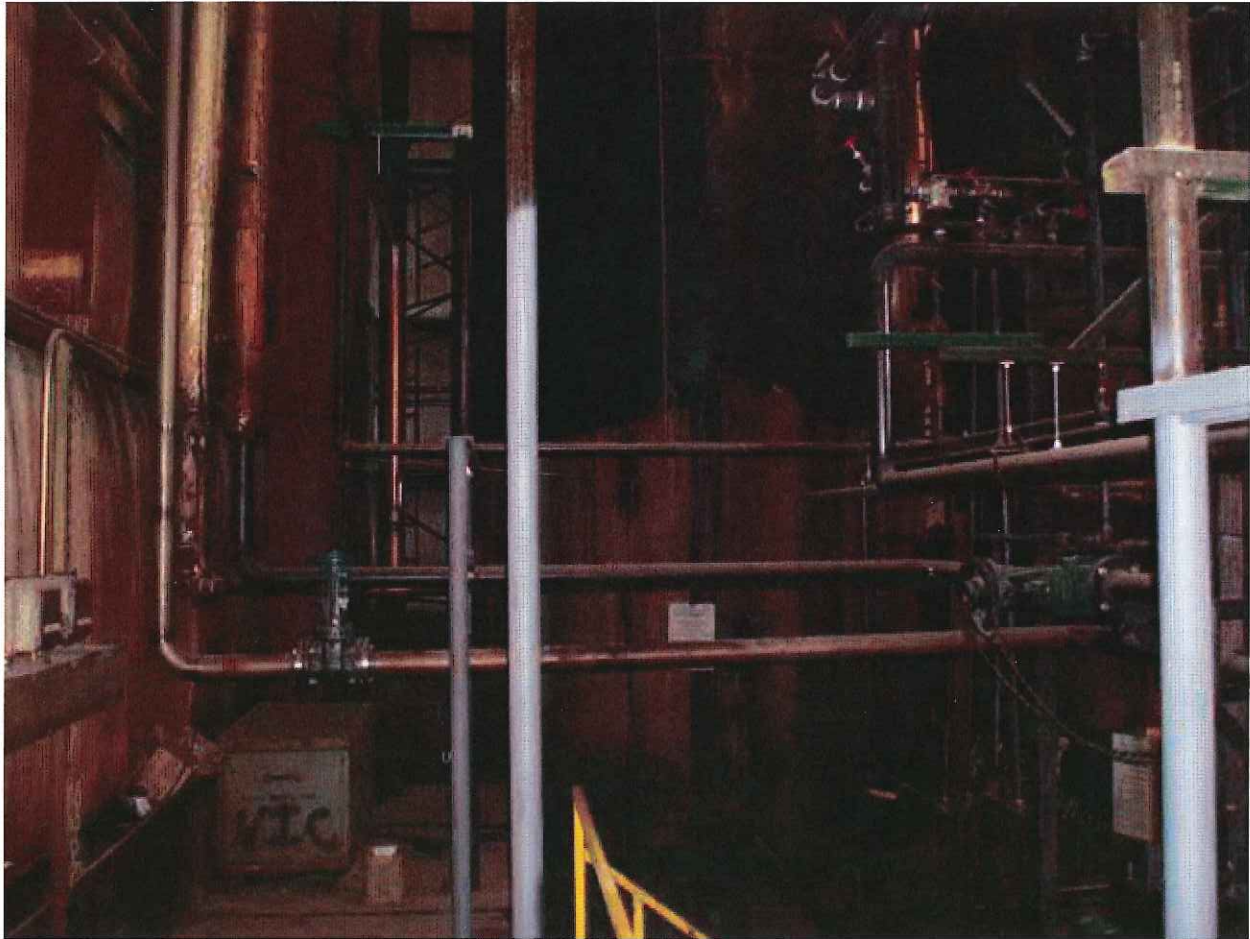
Stella-Jones Corporation, Bangor, WI  
Bryan Gangwisch, U.S. EPA 7/28/16





11. A view, at the Boiler Building, of Tank 7, in which rudimentary waste water treatment/settling occurs as stated by Ms. Werlein. Tank 7 is primarily utilized for storage as stated by Ms. Werlein.

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12. Another view, at the Boiler Building, of Tank 7 (in the background) and the lines and pumps associated with Tanks 7 and 9.

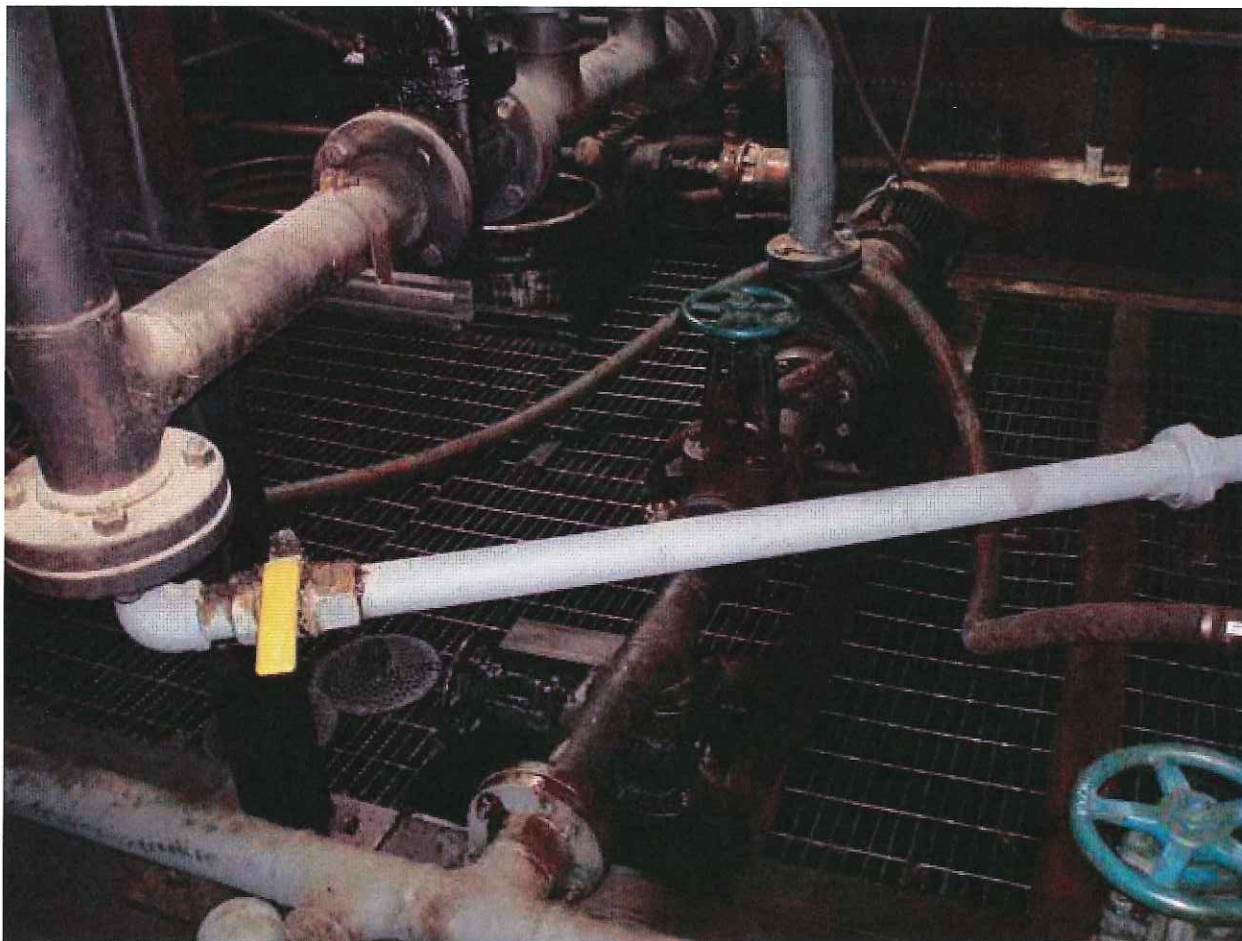
Stella-Jones Corporation, Bangor, WI  
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13. Another view, at the Boiler Building, of the lines and pumps associated with Tanks 7 and 9.

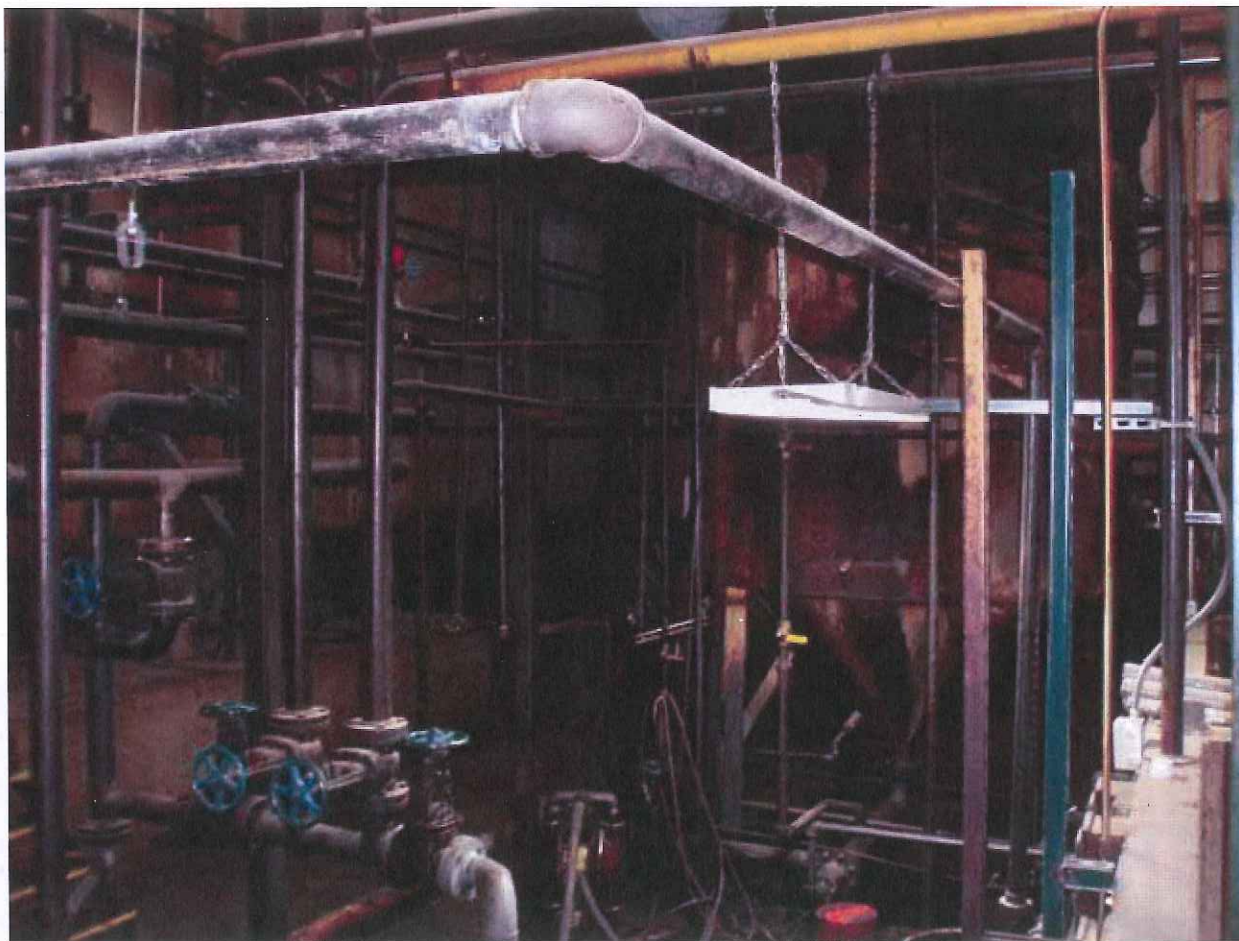
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14. Another view, at the Boiler Building, of the lines and pumps associated with Tanks 7 and 9.

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15. Another view, at the Boiler Building, of the lines and pumps associated with Tanks 7 and 9.

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16. Another view, at the Boiler Building (Tank 9 in the background), of the lines and pumps associated with Tanks 7 and 9.

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17. Another view, at the Boiler Building, of Tank 9 and lines associated with Tanks 7 and 9.

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18. Another view, at the Boiler Building, of Tank 9.

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19. A view, at the Boiler Building, of the area around Tank 9.

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20. A view, at the Boiler Building, of the north evaporator.

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21. A view, at the Boiler Building, of the south evaporator.

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This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

## LARGE QUANTITY GENERATOR INSPECTION

### Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	Y	662.011
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. <i>Davy Laboratories # 632021390</i>	Y	662.011(3)(a)1
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3)
E. Generator submitted a notification form and obtained an EPA ID#.	Y	662.012
Note: A subsequent notification should be submitted when there is an ownership or name change.		

### Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1)
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1)
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2)
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	Y	662.023(3)
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	Y	662.020(1)
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	N/A	662.034(13)
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.034(13)
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1)
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1)
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030
K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031





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## LARGE QUANTITY GENERATOR INSPECTION

### Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1)
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2)
N. Placards are offered to the initial transporter.	Y	662.033

### Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1)
B. A copy of the LDR notification and certification for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	Y	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	Y	668.03
D. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	N/A	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	Y	668.07(1)
H. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h)
I. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1)
J. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2)
K. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.034(1)(d)



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	Y	662.042(1)
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	NA	662.042(2)
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2)

### Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033). <i>Spill control equipment</i>	N	662.034(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d)
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d)

### Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d)
B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	Y	662.034(1)(d)



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 6: Contingency Plan and Emergency Procedures

C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0053(2)).	Y	662.034(1)(d)
D. Contingency plan was <u>amended</u> due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	Y	662.034(1)(d) reason non-determined
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d)
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	Y	662.034(1)(d)
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d)

### Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d)
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d)





## LARGE QUANTITY GENERATOR INSPECTION

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### Section 7: Personnel Training Requirements

C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d)
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d)
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d)
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d)
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	Y	662.034(1)(d)
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	662.034(1)(d)
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d)

### Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	
B. Accumulation start date is clearly marked and visible for inspection on each container. 1 container	N	662.034(1)(b)
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c)
D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	N/A	662.034(1)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected  
Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply No 'box' is an open ended question



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 8: 90-Day Container Accumulation

H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.034(1)(a)1
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	N/A	662.034(1)(a)1
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.034(1)(a)1
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.034(1)(a)1
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.034(1)(a)1

### Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration $\geq 10\%$ by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2)). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service. 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N/A	
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a)
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates $< 300$ hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a)
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a)
E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a)
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at $< 10\%$ . 3. The process has not changed to affect the total organic concentration of the waste.	↓	662.034(1)(a)

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply

No 'box' is an open ended question



## LARGE QUANTITY GENERATOR INSPECTION

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### Section 9: Subchapter BB Standards for Equipment Leaks

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).

Y/A 662.034(1)(a)

H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.

Y/A

### Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 11.A. (NR 665.1087(2)(a), NR 662.034(1)(a)1).

1. Between 26 and 119 gallons.

2. Greater than 119 gallons and not in light material service.

Y

B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)):

1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container.

2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container.

3. The initial determination is reviewed and updated at least once every 12 months.

4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to  $\geq 500$  ppmw.

5. The average VO concentration is determined by direct measurement or by knowledge.

Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.

N

C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).

N/A 662.034(1)(a)1

D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)).

N

Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.

E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)):

1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities.

2. Radioactive mixed wastes in accordance with NRC requirements

N

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090(10)):

1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements.

2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers

N

G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Section 11.

N

H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)):

1. Container meets applicable US DOT packaging requirements.

2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container.

3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere.

Y 662.034(1)(a)1

Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

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## LARGE QUANTITY GENERATOR INSPECTION

### Section 10: Subchapter CC Level 1 Container Standards

I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	N/A	662.034(1)(a)1
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	N/A	662.034(1)(a)1
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	N/A	662.034(1)(a)1
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	N/A	662.034(1)(a)1
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	N/A	662.034(1)(a)1
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	N/A	662.034(1)(a)1
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	N/A	662.034(1)(a)1
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	N/A	662.034(1)(a)1
Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	N/A	662.034(1)(a)1

### Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	N/A	
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.	N/A	662.034(1)(a)2



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 11: Subchapter CC Level 2 Container Standards

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.	N/A	662.034(1)(a)2
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2
J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)	✓	662.034(1)(a)2

### Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	N/A	
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))	N/A	662.034(1)(a)2



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### Section 12: Subchapter CC Level 3 Container Standards

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)	N/A	662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))	N/A	662.034(1)(a)2
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))	N/A	662.034(1)(a)2

### Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a)
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1
E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	N/A	662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(3)(a)1
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.034(3)(a)2
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N/A	662.034(3)(b)
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	N/A	662.034(3)(b)

### Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e)
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree.	Y	662.027(1)
Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.		

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply

No 'box' is an open ended question



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### Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	Y	
B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N/A	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2)
D. Used oil containers and tanks are marked "used oil".	Y	679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.	Y	679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	Y	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11

### Section 16: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 17.  Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	Y	
B. Universal waste has not been disposed, treated or diluted.  Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N/A	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	Y	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	Y	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2)

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply No 'box' is an open ended question

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### Section 16: Universal Waste

H. Length of accumulation time is demonstrated by any of the following: ① Each container is marked or labeled with the earliest date the waste is generated or received. 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	Y	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	N/A	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	Y	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	N	

### Section 17: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 18.	N/A	
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7)
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a)
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b)
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c)
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b





## LARGE QUANTITY GENERATOR INSPECTION

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### Section 17: F006 Wastewater Treatment Sludge

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".

N/A

662.034(7)(d)4

J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.

Y

662.034(7)(d)1.c

K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.

Y

662.034(7)(d)5

L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.

Y

662.034(8)

### Section 18: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.

Y

662.034(1)

B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).

Y

C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).

Y

D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)):

1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment.
2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.

N/A

662.034(1)(a)2



7/28/16

Stella Jones Corporation

WID078675634

## WOOD PRESERVING FACILITIES - DRIP PADS



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## Section 1: Existing Drip Pads

A. Indicate in the comments section the approximate date the drip pad was constructed. If the drip pad was constructed after June 1, 1995, go to Section 2. (NR 665.0440(1)).

Note: Drip pads constructed after June 1, 1995 are new drip pads.

B. A PE certified written assessment of the drip pads is kept at the facility and documents the extent to which the drip pads meet all of the design and operating standards of NR 665.0443, excluding liner and leak detection requirements of NR 665.0443(2). (NR 665.0441(1)).

Note: See Section 2 of this inspection form for NR 665.0443 requirements.

C. The written assessment is reviewed, updated and re-certified annually until the drip pad complies with NR 665.0443 standards. (NR 665.0441(1))

D. If the owner or operator is upgrading the drip pad to meet the liner and leak detection requirements of NR 665.0443(2), a PE certified written plan describing the changes has been submitted to the DNR no later than 2 years before the changes were completed. (NR 665.0441(2))

E. As-built drawings certified by a PE were submitted to the DNR upon completion of all upgrades. (NR 665.0441(3))

662.034(1)(a)3

662.034(1)(a)3

662.034(1)(a)3

662.034(1)(a)3

## Section 2: Design and Operating Requirements

A. Drip pads are constructed of non-earthen materials, except wood and non-structurally supported asphalt. (NR 665.0443(1)(a))

B. Drip pads are properly sloped to free-drain all wastes and water towards the collection system. (NR 665.0443(1)(b))

C. A curb or berm is constructed around the entire perimeter of the drip pad. (NR 665.0443(1)(c))

D. Drip pads are of sufficient structural strength and thickness to prevent failure. (NR 665.0443(1)(e))

E. Drip pads are free of cracks, gaps or other deterioration that could cause releases. (NR 665.0443(3))

F. Drip pads and collection system convey, drain and collect drippage and precipitation to prevent run-off. (NR 665.0443(4))

G. The drip pad is inside or under a structure that provides protection from precipitation so that run-off or run-on is not generated. (NR 665.0440(2)) If YES, go to Question J.

H. A run-on control system is capable of preventing flow onto the drip pad during peak discharge from a 24-hour, 25-year storm unless the system has sufficient excess capacity to contain the run-on. (NR 665.0443(5))

I. A run-off management system is designed to collect and control the water volume from a 24 hour, 25-year storm. (NR 665.0443(6))

J. Drippage and precipitation is removed from the collection system to prevent overflow onto the drip pad. (NR 665.0443(8))

K. The drip pad surface is cleaned thoroughly in a manner and frequency to remove accumulated residues to allow weekly inspections of the entire drip pad surface. (NR 665.0443(9))

662.034(1)(a)3

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# WOOD PRESERVING FACILITIES - DRIP PADS

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## Section 2: Design and Operating Requirements

L. The date and time of each cleaning and the procedure used is recorded in the operating log. (NR 665.0443(9))	Y	662.034(1)(a)3
M. Drip pads are operated and maintained to minimize tracking of hazardous waste off the drip pad. (NR 665.0443(10))	Y	662.034(1)(a)3
N. Records at the facility document treated wood from pressure and non-pressure processes are held on the drip pad until drippage has ceased. (NR 665.0443(11))	Y	662.034(1)(a)3
O. Collection and holding units associated with run-on and run-off control systems are emptied or otherwise managed as soon as possible after storms to maintain the design capacity of the system. (NR 665.0443(12))	Y	662.034(1)(a)3
P. If the owner or operator detects a condition that may cause a release of hazardous waste, all of the following procedures are followed. (NR 665.0443(13)) 1. Repairs are made in a reasonable amount of time after discovery. 2. A record of discovery is entered in the operating log. 3. The portion of the drip pad affected by the condition is immediately removed from service. 4. Steps to be taken to repair the drip pad and remove any leakage from below the drip pad are determined. 5. A schedule for accomplishing clean up and repairs is established. 6. DNR is notified of the condition immediately after discovery. 7. Within 10 working days, DNR is given written notice, including a description of the steps to be taken to repair the drip pad and clean up leakage and the schedule for accomplishing this work. 8. Upon completing all repairs and clean up, the owner or operator provides written notification and PE certification to DNR that repairs and cleanup were completed according to their written plan.	N	662.034(1)(a)3
Q. Documentation of past operating and waste handling practices are maintained in the operating record, including all of the following. (NR 665.0443(14)) 1. Identification of preservative formulations used in the past. 2. Description of drippage management practices. 3. Description of treated wood storage and handling practices.	Y	662.034(1)(a)3
R. The drip pads are designed and operated with one of the following. (NR 665.0442) 1. A sealed surface. 2. A liner and leak detection system. <i>steel drip pads</i>	N/A	662.034(1)(a)3
S. If the drip pad has a sealed surface, all of the following are met. (NR 665.0443(1)(d)1. & 2.) 1. The entire surface of the drip pad has been sealed, coated or covered with a surface material having a hydraulic conductivity $\leq 1 \times 10^{-7}$ cm/sec. 2. The surface where drippage occurs or may run across will contain the drippage, precipitation or other wastes while being routed to a collection system. 3. The surface material is free of cracks and gaps that could adversely affect its hydraulic conductivity. 4. The surface material is chemically compatible with the preservatives in contact with the drip pad. 5. The owner or operator has a PE certified assessment that states the drip pad meets all of the drip pad design and operating requirements in NR 665.0443. 6. The assessment is reviewed, updated and re-certified annually.	N/A	662.034(1)(a)3
T. If a synthetic liner is installed below the drip pad, the liner meets all of the following. (NR 665.0443(2)(a)) 1. Designed, constructed and installed to prevent leakage from the drip pad into subsurface soil or groundwater during the active life of the drip pad. 2. Constructed of materials with appropriate chemical properties and sufficient strength and thickness to prevent failure due to pressure gradients, contact with the waste, climatic conditions and stress of daily operation. 3. Placed on a foundation or base that provides support and prevents failure due to settlement, compression or uplift. 4. Covers all surrounding earth that could come in contact with the waste or leakage.	N/A	662.034(1)(a)3





## WOOD PRESERVING FACILITIES - DRIP PADS

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### Section 2: Design and Operating Requirements

U. If a synthetic liner is installed, a leak detection system that meets all of the following was installed immediately above the liner. (NR 665.0443(2)(b) & (c)) 1. Constructed of materials that are chemically resistant to the waste managed on the drip pad. 2. Constructed of materials with sufficient strength and thickness to prevent collapse under pressures exerted by overlaying materials and equipment used on the drip pad. 3. Functions without clogging. 4. Detects failure of the drip pad or the presence of a release at the earliest practical time. 5. Collects leakage that can be removed from below the drip pad. 6. The date, time and quantity of leakage removed from the system are documented in the operating log.	N/A	662.034(1)(a)3
V. If a synthetic liner is installed, the owner or operator has a PE certified statement that the drip pad meets all of the design and operating requirements in NR 665.0443. (NR 665.0443(7))	N/A	662.034(1)(a)3
W. The associated collection system meets the tank standards in NR 665 subch. J. (NR 665.0190(3))	N/A	662.034(1)(a)3
X. Written procedures are kept at the facility to ensure all waste is removed from the drip pad and associated collection system every 90 days.	Y	662.034(1)(a)3
Y. For each waste removal event, records kept at the facility document the quantity of waste removed from the drip pad and the sump or collection system, and the date and time of removal.	Y	662.034(1)(a)3

### Section 3: Inspections

A. The drip pad is inspected weekly and after storms to detect evidence of the following. (NR 665.0444(2)) 1. Deterioration, malfunctions or improper operation of run-on and run-off control systems. 2. The presence of leakage in and proper functioning of the leakage detection system. 3. Deterioration or cracking of the drip pad surface.	Y	662.034(1)(a)3
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### Section 4: Closure Requirements

A. Previously used drip pads are present at the facility. If NO, go to Section 5.	N	
B. If the previously used drip pads are closed, all containment system components (i.e., pads and liners), contaminated subsoils, structures, and equipment have been decontaminated or all waste residues and leakage were removed. (NR 665.0445(1))	N/A	662.034(1)(a)3
C. If the previously used drip pads are in the process of being closed, the facility is voluntarily complying with applicable NR 700 requirements. Note: If the facility is not voluntarily complying with NR 700 standards, the closure and long term care requirements of NR 665.0445(2) & (3) apply.	N/A	662.034(1)(a)3
D. All waste residues and decontamination materials from closure have been managed as hazardous waste. (NR 665.0445(1))	N/A	662.034(1)(a)3



## WOOD PRESERVING FACILITIES - DRIP PADS

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### Section 5: Contingency Plan

A. The contingency plan includes all of the following to describe how the owner/operator will respond immediately to infrequent and incidental drippage in storage yards. (NR 665.0440(3))

1. Clean up the drippage.
2. Document the cleanup of the drippage.
3. Retain documents regarding cleanup for 3 years.
4. Manage contaminated media in a manner consistent with state rules.

Note: For information on the proper waste classification of contaminated media, see EPA's Wood Preserving RCRA Compliance Guide at

<http://www.epa.gov/compliance/resources/publications/assistance/sectors/woodrcraguide.pdf>

Y

662.034(1)(a)3